

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In re

ADRIAN McCLOSKEY,

Case No. 6:15-bk-02095-CCJ

Chapter 7

Debtor.

**APPLICATION TO AUTHORIZE EMPLOYMENT
OF ATTORNEY AND DECLARATION IN SUPPORT**

APPLICATION

The duly appointed trustee in this Chapter 7 case, Gene T. Chambers, applies for an order approving employment of Michael A. Nardella and the law firm of Nardella & Nardella, PLLC to represent and assist the Trustee in carrying out the Trustee's duties under the Bankruptcy Code. After reviewing the facts and legal issues in this case, the trustee has concluded that the assistance of counsel is necessary to assist the trustee with the investigation and recovery of assets and otherwise assist the trustee in discharging the trustee's statutory duties.

The trustee has selected this attorney because he has the ability and experience to render the necessary assistance. The attorney has further agreed to seek compensation at the attorney's standard hourly rate of \$285.00 hour and reasonable costs and expenses pursuant to the provisions of Section 330 of the Bankruptcy Code.

To the best of the trustee's knowledge, the attorney has no connection with the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee except as disclosed in the following declaration.

The Trustee therefore prays that the court will enter an order approving the employment of counsel.

/ s / Gene T. Chambers
Gene T. Chambers, Trustee
Florida Bar No. 0187642
Gene T. Chambers, P.A.
Post Office Box 533987
Orlando, FL 32853
Telephone (407) 872-7575
Facsimile (407) 246-0008
E-mail: gchamberspa@cfl.rr.com

DECLARATION OF PROPOSED ATTORNEY

I, Michael A. Nardella, declare under penalty of perjury pursuant to the provisions of 28 U.S.C. §1746 that the following statements are true and correct:

1. I am an attorney admitted to practice in the United States District Court for the Middle District of Florida.
2. I am an attorney and shareholder with the law firm of Nardella & Nardella, PLLC.
3. Neither I, nor any member of my firm, have any connection with the debtors, creditors, or any other party in interest, their respective attorneys and accountants, the United States Trustee, or any other person employed in the office of the United States Trustee except that: (a) the firm may have been involved in the past or may be involved in the future in matters where one or more of said creditors may be involved and (b) the firm may have been engaged or may be engaged by one or more of said creditors in matters unrelated to this case.
4. Based on the foregoing, Michael A. Nardella believes that he and the firm of Nardella & Nardella, PLLC is a “disinterested person” within the meaning of §101(14) of the Bankruptcy Code.

/ s / Michael A. Nardella
Michael A. Nardella, Esquire
Florida Bar No. 51265
Nardella & Nardella, PLLC
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Orlando, Florida 32801
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was provided electronically via the CME/ECF system or by U.S. Mail, postage prepaid, to the following on July 27, 2017: Adrian McCloskey, 8660 Crestgate Circle, Orlando, FL 32819; Ryan Mitchell, Esq., The Law Office of Ryan Mitchell, PLLC, 7463 Conroy Windermere Road, Suite A, Orlando, FL 32835; Michael A. Nardella, Esq., Nardella & Nardella, PLLC, 315 East Robinson Street, Suite 600, Orlando, FL 32801; and U.S. Trustee, George C. Young Federal Courthouse, 400 West Washington Street, Suite 1100, Orlando, FL 32801.

/s/ Gene T. Chambers
Gene T. Chambers